

EXHIBIT 19

Declaration of Leah Godesky

In the Matter Of:

FAIR ISAAC CORPORATION

vs

FEDERAL INSURANCE COMPANY, ET AL.

TAMRA PAWLOSKI

January 18, 2019

HIGHLY CONFIDENTIAL

ATTORNEYS' EYES ONLY



HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

TAMRA PAWLOSKI - 01/18/2019

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1 how it was going to be used within the -- I

2 mean, there were diagrams that were done, and

3 all of that, it was never -- we never talked

4 about the consent part.

5 And the salespeople were trying

6 to sell us to other products.

7 Q I am handing you what has been

8 marked as Exhibit 253.

9 (The above described document was

10 marked Exhibit 253 for identification as

11 of this date.)

12 Q Have you seen this e-mail

13 before?

14 A I have, yes.

15 Q At the very back there is an

16 e-mail dated February 2, 2016 from Henry

17 Mirolyuz to Mike Sawyer. Do you see that?

18 A Yes.

19 Q It's asking for Mike to copy

20 yourself on future correspondence with vendor

21 management?

22 A Yes.

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1 Q Is that the time you began

2 taking over the discussions?

3 A It was.

4 Q Regarding the future between

5 Blaze Advisor and Chubb?

6 A Yes.

7 Q At the top of the e-mail it

8 references a meeting between you and Mike

9 Sawyer in early February. Did that meeting

10 occur?

11 A It did.

12 Q What was your recollection from

13 that meeting?

14 A So myself and Ramesh Pandey were

15 in that meeting, and we were talking about the

16 utilization of the software, and also talking

17 about the new products, like how can we come to

18 an agreement on all of this without involving

19 legal?

20 Q And what conclusions did you

21 arrive at during the phone call?

22 Did you come up with any action

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1 items to do next?

2 A This was actually a

3 face-to-face, although it said "will not be on

4 the phone," mike actually came to our office

5 for that meeting.

6 And we presented how it was

7 going to be used, what products it was going to

8 be used with, kind of like, I remember there

9 being, Ramesh kind of did a whole big

10 presentation on the white board, and then Mike

11 was going to take it back.

12 Q And what was your recollection

13 of how Blaze Advisor was going to be used by

14 the new company going forward?

15 A That it could not be used by,

16 any of the applications by ACE, because ACE

17 was -- the way that they underwrote would

18 not -- the Blaze product wouldn't be applicable

19 for it.

20 Q And so that was right away it

21 was not going to be used?

22 A Right.

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1 Q Because the ACE platform was

2 essentially just different than the Chubb

3 platform, correct?

4 A That's correct.

5 Q Did you talk about -- in that

6 conversation, was it stated that the use of

7 Blaze Advisor would never be used by the legacy

8 ACE platforms?

9 A Yes.

10 Q So, at the time -- after the

11 merger, after the merger up until you left,

12 were there any discussions about merging the

13 platforms used by legacy ACE and legacy Chubb?

14 A No. In fact, many of them were

15 being retired.

16 Q Many of?

17 A The applications were being

18 retired.

19 Q The --

20 A Legacy Chubb.

21 Q And what about the legacy ACE

22 applications while you were still at Chubb,